

STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION
BUREAU OF AIR POLLUTION CONTROL

**Director's Review and Preliminary Determination of Permit Issuance
for
Department of the Army, Hawthorne Army Depot
Bulk Energetics Demilitarization System (BEDS)**

July 19, 2006

The Department of the Army, Hawthorne Army Depot (HWAD) has submitted an application for a new Class 1 Operating Permit to Construct (OPTC) to the Nevada Division of Environmental Protection - Bureau of Air Pollution Control (NDEP-BAPC). The OPTC application was submitted on March 6, 2006 and deemed complete on April 20, 2006. The Department of the Army, Hawthorne Army Depot is located on 144,441 acres of Federal land south of Walker Lake in Mineral County, Nevada in hydrographic basins HA109, 110B, and 110C.

The NDEP-BAPC has reviewed the application and has made a preliminary determination to issue the Class I Operating Permit to Construct.

The proposed HWAD BEDS plant will consist of bulk slurry feed and handling systems, rotary kiln (RK), combustion chamber, air pollution control equipment (APC), and plant support systems. The plant support systems consist of a distillate oil supply, electrical power, instrument and plant air, plant water, runoff water control and telecommunication systems. The control system for operating the detonation plant uses a control system that incorporates all necessary environmental monitoring.

Current emission estimates indicate that the HWAD facility will be a Class 1 stationary source because emissions of criteria pollutants are greater than 100 tons per year (tpy).

<i>BEDS Unit Potential to Emit</i>		
Pollutant		TPY
PM	(Particulate Matter)	0.73
PM₁₀	(Particulate matter <10 microns in diameter)	0.78
NO_x	(Oxides of Nitrogen)	63.30
CO	(Carbon monoxide)	2.85
Dioxin/Furans	(Dioxin/Furans)	4.89×10 ⁻⁹
SO₂	(Sulfur Dioxide)	16.10
Hg	(Mercury)	3.18×10 ⁻³
Pb, Ca	(Lead and Cadmium)	5.62×10 ⁻³
As, Be, Cr	(Arsenic, Beryllium, Chromium)	2.25×10 ⁻³
HC's	(Hydrocarbon's)	0.45
HCl/CL₂	(Hydrochloric Acid/ Chlorine Gas)	1.19

The air quality analyses demonstrate that the emissions from the proposed processes will not cause or contribute to a violation of any applicable federal or state ambient air quality standard. After review of the application and independent NDEP-BAPC air quality analysis, the agency has determined that the proposed project may be constructed and operated without an adverse impact on air quality and will not cause or contribute to an increment exceedence.

The proposed source must comply with all State and Federal air quality requirements and all conditions established within the proposed Operating to Construct Permit.